



8 UNITED STATES DISTRICT COURT

9 FOR THE CENTRAL DISTRICT OF CALIFORNIA

10 June 2024 Grand Jury

11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 v.

14 IVAN JACOBO IDROBO ARREDONDO,
aka "Ivan Jacob Idrobo
Arredondo,"
aka "Marlon Vasquez," and
16 JUAN DIEGO PALTA MONTERO,
aka "Juan Diego Palta
Moreno,"
aka "Ñeque,"

17 Defendants.

18 CR 2:24-cr-00203(A)-MCS

19 F I R S T
S U P E R T
I N D I C S E D I N G
I N D I C C T M E N T

20 [18 U.S.C. § 2339B(a)(1):
Attempting to Provide Material
Support to a Foreign Terrorist
Organization; 21 U.S.C. § 960a:
Conspiracy to Engage in Narco-
Terrorism; 21 U.S.C. § 963:
Conspiracy to Manufacture and
Distribute Cocaine for the Purpose
of Unlawful Importation; 18 U.S.C.
§ 924(o): Conspiracy to Possess
Firearms, Machineguns, and
Destructive Devices in Furtherance
of a Drug Trafficking Offense; 21
U.S.C. §§ 959(a),
960(b)(1)(B)(ii): Distribution of
Cocaine for the Purpose of
Unlawful Importation; 18 U.S.C.
§§ 924(c)(1)(A)(i), (c)(1)(B)(ii):
Possession of Firearms,
Machineguns, and Destructive
Devices in Furtherance of a Drug
Trafficking Offense; 18 U.S.C.
§ 2(b): Causing an Act to be Done;
21 U.S.C. §§ 853, 970, 18 U.S.C.
§ 924(d)(1), 28 U.S.C. § 2461(c):
Criminal Forfeiture]

The Grand Jury charges:

INTRODUCTORY ALLEGATIONS

At times relevant to this First Superseding Indictment:

1. Transnational criminal organizations ("TCO") distribute drugs into communities throughout the United States that are sourced from manufacturers around the world, fueling the epidemic of addiction and overdose deaths facing the nation. TCOs employ violence and terrorism throughout the Western Hemisphere to maintain and further their criminal enterprises. This conduct destabilizes countries with significant importance to United States national interests and leads to violence within the United States.

2. Approximately 98% of cocaine seized in the United States is produced in Colombia. The Revolutionary Armed Forces of Colombia ("FARC") was a Marxist-Leninist guerrilla group that operated in Colombia beginning in 1964. For over five decades, FARC's control extended throughout all regions of Colombia, including the Southwestern area consisting of Cauca, Valle Del Cauca, and Nariño, where cocaine was produced. FARC operated as a TCO controlling cocaine production in Colombia, extorting money from individuals engaged in the manufacture of cocaine, and partnering with Mexico-based cartels to import cocaine into the United States.

3. The Revolutionary Armed Forces of Colombia-People's Army ("FARC-EP") is a dissident faction that emerged from FARC after FARC-EP rejected a 2016 peace agreement reached between FARC and the Colombian government. FARC-EP is Colombia's most powerful and violent dissident group and has continued to carry out TCO activities and terrorist acts FARC perpetrated. FARC-EP continues to control the Southwestern area of Colombia, consisting of Cauca, Valle Del

1 Cauca, and Nariño, which produces approximately 70% of the cocaine
2 manufactured in Colombia. FARC-EP partners with Cartel de Sinaloa
3 ("Sinaloa Cartel"), Cartel de Jalisco Nueva Generacion ("CJNG"), La
4 Nueva Familia Michoacana, and other designated terrorist
5 organizations to import cocaine into the United States.

6 4. To maintain and further its TCO activities, FARC-EP engages
7 in violence in Colombia, including attacks on government. FARC-EP
8 has committed armed assaults, assassinations, extortion, and hostage-
9 takings. The group has focused most of its attacks on Colombian
10 government and military targets but has also attacked critical
11 infrastructure, Colombia's civilian population, and United States
12 military personnel in the country. FARC-EP equips its members with
13 small arms, machineguns, mines, and improvised explosive devices.

14 5. On December 1, 2021, the United States Secretary of State
15 designated FARC-EP a foreign terrorist organization. On February 20,
16 2025, the Sinaloa Cartel, CJNG, and La Nueva Familia Michoacana, all
17 of which partner with FARC-EP, were also designated as foreign
18 terrorist organizations.

19 6. Defendant IVAN JACOBO IDROBO ARREDONDO, also known as
20 ("aka") "Ivan Jacob Idrobo Arredondo," aka "Marlon Vasquez"
21 ("IDROBO"), was a member and leader of FARC-EP factions, including
22 the Jaime Martinez front of FARC-EP. Defendant JUAN DIEGO PALTA
23 MONTERO, aka "Juan Diego Palta Moreno," aka "Ñeque" ("PALTA"), was
24 IDROBO's right-hand man and a member and leader of the Jaime Martinez
25 front of FARC-EP. FARC-EP disseminates propaganda videos to convince
26 the Colombian public and government that FARC-EP controls Colombia,
27 to threaten rivals, and to recruit young Colombians to join FARC-EP.
28 The following screenshot is from a video dated March 26, 2024, which

1 FARC-EP provided to news outlets in Colombia, depicting FARC-EP
 2 banners and flags, armed FARC-EP members, and defendant IDROBO to the
 3 speaker's immediate left, as well as the slogan "manuel marulanda
 4 vive" (translated: "Manuel Marulanda lives"), a reference to the
 5 deceased founder of FARC:



16 The following screenshot is from a video FARC-EP posted on Youtube,
 17 depicting armed FARC-EP members to either side of defendant IDROBO,
 18 identified by his alias "Marlon Vasquez":



1 7. These Introductory Allegations are incorporated into each
2 count of this First Superseding Indictment.
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1 COUNT ONE

2 [18 U.S.C. §§ 2339B(a)(1), 2(b)]

3 [ALL DEFENDANTS]

4 Beginning on an unknown date, but no later than on or about
5 March 25, 2023, and continuing until on or about March 27, 2024, in
6 an offense begun and committed out of the jurisdiction of any
7 particular State or District of the United States, including in
8 Colombia, the Netherlands, Czech Republic, and elsewhere, defendants
9 IVAN JACOBO IDROBO ARREDONDO, also known as ("aka") "Ivan Jacob
10 Idrobo Arredondo," aka "Marlon Vasquez," and JUAN DIEGO PALTA
11 MONTERO, aka "Juan Diego Palta Moreno," aka "Ñeque," and others known
12 and unknown to the Grand Jury, at least one of whom will be first
13 brought to, and arrested in, the Central District of California,
14 knowingly attempted to provide material support and resources, as the
15 term is defined in Title 18, United States Code, Section 2339A(b)(1),
16 namely, weapons, including approximately 50 AK-47 rifles, 10,000 AK-
17 47 rounds of ammunition, six rocket-propelled grenade launchers, 100
18 rocket-propelled grenades, 10,000 rounds of .762 ammunition, 10,000
19 rounds of 2.23 ammunition, 100 grenades, 12 machineguns, and 300
20 banana clips for AK-47 rifles, to FARC-EP, which at all relevant
21 times was designated by the Secretary of State as a foreign terrorist
22 organization, knowing that FARC-EP had been designated as a foreign
23 terrorist organization, and knowing that FARC-EP had engaged in, and
24 was engaging in, terrorist activity and terrorism, and such offense
25 occurred in and affected interstate and foreign commerce.

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1 COUNT TWO

2 [21 U.S.C. § 960a(a); 18 U.S.C. § 2(b)]

3 [ALL DEFENDANTS]

4 A. OBJECT OF THE CONSPIRACY

5 Beginning on an unknown date, but no later than on or about
6 March 25, 2023, and continuing until on or about March 27, 2024, in
7 an offense begun and committed out of the jurisdiction of any
8 particular State or District of the United States, including in
9 Colombia, the Netherlands, Czech Republic, and elsewhere, defendants
10 IVAN JACOBO IDROBO ARREDONDO, also known as ("aka") "Ivan Jacob
11 Idrobo Arredondo," aka "Marlon Vasquez," and JUAN DIEGO PALTA
12 MONTERO, aka "Juan Diego Palta Moreno," aka "Ñeque," each of whom
13 will be arrested and first brought to the Central District of
14 California, and others known and unknown to the Grand Jury, conspired
15 and agreed with each other to engage in conduct that would be
16 punishable under Title 21, United States Code, Section 841(a) if
17 committed within the jurisdiction of the United States, namely, the
18 distribution of, and possession with the intent to distribute, at
19 least five kilograms of a mixture and substance containing a
20 detectable amount of cocaine, knowing and intending to provide,
21 directly and indirectly, something of pecuniary value to a person and
22 organization that has engaged and engages in terrorism and terrorist
23 activity, namely, FARC-EP, which has been designated by the United
24 States Secretary of State as a foreign terrorist organization
25 pursuant to Section 219 of the Immigration and Nationality Act and
26 remains so designated, having knowledge that such organization and
27 persons have engaged and engage in terrorism and terrorist activity,
28 in violation of Title 21, United States Code, Section 960a, and such

1 drug trafficking and terrorism offenses occurred in and affected
2 interstate and foreign commerce.

3 B. MANNER AND MEANS OF THE CONSPIRACY

4 The object of the conspiracy was to be accomplished, in
5 substance, as follows:

6 1. Defendant IDROBO, Co-conspirator 1, and Co-conspirator 4
7 would own and operate laboratories throughout Colombia that
8 manufactured and distributed cocaine.

9 2. Co-conspirators 1, 2, 3, and 4, in laboratories throughout
10 Colombia, would manufacture cocaine for importation into the United
11 States and elsewhere.

12 3. Defendants IDROBO and PALTA, and Co-conspirators 1 and 2,
13 would negotiate the sale of cocaine, believing it would be imported
14 into the United States and distributed within the Central District of
15 California, with people they believed to be drug traffickers.

16 4. Defendants IDROBO and PALTA, and Co-conspirators 1 and 3,
17 would negotiate with people they believed to be drug traffickers for
18 the exchange of firearms and ammunition, including machineguns,
19 grenades, destructive devices, and rifles, for cocaine that they
20 believed would be imported into the United States and distributed
21 within the Central District of California.

22 5. Co-conspirators 1, 2, 3, and 4 would store cocaine in
23 cocaine laboratories and residences in Colombia.

24 6. Co-conspirators 1 and 2 would transport and distribute
25 cocaine to people they believed to be drug traffickers for the
26 purpose of its importation into the United States.

1 7. Defendant PALTA and Co-conspirator 1 would coordinate the
2 transportation of firearms and destructive devices used as payment
3 for cocaine they believed would be imported into the United States.

4 C. OVERT ACTS

5 On or about the following dates, in furtherance of the
6 conspiracy and to accomplish its object, defendants IDROBO and PALTA,
7 together with others known and unknown to the Grand Jury, committed
8 and caused to be committed various overt acts in the countries of
9 Colombia, the Czech Republic, and the Netherlands, including, but not
10 limited to, the following:

11 Overt Act No. 1: On May 3, 2023, in Cali, Valle del Cauca,
12 Colombia, Co-conspirators 1 and 2, and another co-conspirator, met
13 with persons they believed to be drug traffickers with connections
14 and drug routes into the United States, but who were, in fact, a
15 confidential source working with the United States Drug Enforcement
16 Administration ("CS-1") and an undercover agent with the Colombian
17 National Police ("UC-1"). At this meeting, in coded language, Co-
18 conspirators 1 and 2 agreed to provide CS-1 and UC-1 approximately
19 seven kilograms of cocaine in Cali, Colombia, for importation into,
20 and distribution within, the United States.

21 Overt Act No. 2: On May 3, 2023, in Cali, Valle del Cauca,
22 Colombia, Co-conspirator 1 asked CS-1 if Co-conspirator 1 could
23 invest in 0.5 kilograms of the seven kilograms of cocaine destined
24 for the United States in exchange for a cut of the profits from its
25 sale in the United States.

26 Overt Act No. 3: On May 3, 2023, in Jamundi, Valle del Cauca,
27 Colombia, Co-conspirators 1 and 2 gave CS-1 a tour of a cocaine

1 laboratory that was manufacturing and packaging seven kilograms of
2 cocaine.

3 Overt Act No. 4: On May 5, 2023, in WhatsApp messages, Co-
4 conspirator 2 asked UC-1 to call him to discuss the delivery of seven
5 kilograms of cocaine.

6 Overt Act No. 5: On May 6, 2023, in WhatsApp messages, Co-
7 conspirator 2 coordinated with UC-1 the delivery of seven kilograms
8 of cocaine.

9 Overt Act No. 6: On May 6, 2023, in Cali, Valle del Cauca,
10 Colombia, Co-conspirators 1 and 2 drove to meet with UC-1 and CS-1 at
11 a parking lot in order to deliver cocaine. At the parking lot, Co-
12 conspirator 2 transferred approximately seven kilograms of a mixture
13 and substance containing a detectable amount of cocaine to CS-1 and
14 UC-1, packaged in materials depicting the Los Angeles Galaxy soccer
15 team, in exchange for Colombian pesos worth approximately \$10,715
16 USD, as depicted in the below photograph.



1 Overt Act No. 7: On July 31, 2023, in Cali, Valle del Cauca,
2 Colombia, Co-conspirators 1 and 2 met with CS-1 and UC-1 at a food
3 court and, in coded language, discussed future cocaine transactions,
4 transporting cocaine overseas, and meeting with defendant IDROBO
5 regarding drug deals.

6 Overt Act No. 8: On July 31, 2023, in Cali, Valle del Cauca,
7 Colombia, Co-conspirator 1 accepted \$4,500 USD from CS-1 and UC-1 as
8 payment for his investment in 0.5 kilograms of cocaine that Co-
9 conspirator 1 believed was imported and distributed within the United
10 States.

11 Overt Act No. 9: On October 17, 2023, during a telephone
12 conversation, using coded language, Co-conspirator 1 discussed
13 trading cocaine for firearms with CS-1 and a person he believed to be
14 an arms trafficker but who was, in fact, a confidential source for
15 the Drug Enforcement Administration ("CS-2"). During the same
16 conversation, using coded language, Co-conspirator 1, on behalf of
17 defendant IDROBO, negotiated with CS-2 a trip where Co-conspirator 1
18 and defendant IDROBO would send someone to review the firearms and
19 CS-2 would visit Co-conspirator 1's cocaine laboratories.

20 Overt Act No. 10: On November 3, 2023, in Villa Rica, Valle
21 del Cauca, Colombia, Co-conspirators 1 and 3, on behalf of defendant
22 IDROBO, met with CS-1 and requested travel arrangements to review the
23 firearms that would be used as payment for cocaine.

24 Overt Act No. 11: On December 3, 2023, Co-conspirator 3, on
25 behalf of defendant IDROBO, traveled to Prague, Czech Republic, with
26 CS-1 to review and examine firearms that would be traded for cocaine
27 imported into the United States.

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1 Overt Act No. 12: On December 6, 2023, in Prague, Czech
2 Republic, Co-conspirator 3, on behalf of defendant IDROBO, met with a
3 person he believed to be an arms dealer but who was, in fact, a
4 confidential source for the Drug Enforcement Administration ("CS-3"),
5 and traveled to a warehouse in Prague, Czech Republic. There, Co-
6 conspirator 3 met with a person he believed was an arms dealer but
7 who was, in fact, a Czech law enforcement officer, acting in an
8 undercover capacity ("UC-2"), and another person he believed was an
9 arms dealer but who was, in fact, a confidential source with the Drug
10 Enforcement Administration ("CS-4"). At the warehouse, as part of
11 the drugs-for-guns trade, Co-conspirator 3 reviewed, inspected, and
12 held numerous firearms, machineguns, and destructive devices,
13 including Ruchnoi Protivotankovy Granatomet rocket-propelled grenade
14 launchers, Samopal, Model 58, 7.62 caliber submachineguns, and UK-59,
15 model 1959, 7.62x54mm caliber belt-fed machineguns, as depicted in
16 the below photograph.



26 Overt Act No. 13: On December 6, 2023, in Prague, Czech
27 Republic, Co-conspirator 3, on behalf of defendant IDROBO, using
28 coded language, discussed with CS-3 the exchange of cocaine for

1 firearms and the delivery of firearms at a port in Colombia
2 controlled by FARC-EP. During the same conversation, Co-
3 conspirator 3 discussed how the organization he was a member of would
4 use rocket-propelled grenade launchers to shoot at the Colombian
5 Presidential Palace, Colombian Army helicopters, the Colombian
6 Supreme Court Building, local police stations, and the place where
7 Colombian President Petro was located, to force the Colombian
8 government to respect the organization.

9 Overt Act No. 14: On December 8, 2023, in a telephone
10 conversation, Co-conspirator 1, on behalf of defendant IDROBO, agreed
11 with CS-1 and CS-2 to arrange an in-person meeting between defendant
12 IDROBO and CS-1 and CS-2, and for CS-2 to visit cocaine laboratories
13 run by defendant IDROBO and Co-conspirator 1.

14 Overt Act No. 15: On December 14, 2023, in Betulia, Suarez,
15 Valle del Cauca, Colombia, Co-conspirator 1 drove CS-1 to a residence
16 to meet with defendants IDROBO and PALTA for the purpose of
17 discussing the exchange of firearms, machineguns, destructive
18 devices, and ammunition for cocaine.

19 Overt Act No. 16: On December 14, 2023, in Betulia, Suarez,
20 Valle del Cauca, Colombia, defendants IDROBO and PALTA, and Co-
21 conspirator 1, met with CS-1 and discussed the weapons shown to Co-
22 conspirator 3 in the Czech Republic. During this recorded meeting,
23 defendants IDROBO and PALTA, and Co-conspirator 1, analyzed and
24 calculated the costs of firearms, machineguns, destructive devices,
25 and ammunition offered by CS-2. During this meeting, defendants
26 IDROBO and PALTA, and Co-conspirator 1, agreed to provide to CS-1 20
kilograms of cocaine for importation into the United States, and
28 distributed in Los Angeles, California, and stamped and contained in

1 packaging with the word "Hollywood," in exchange for firearms,
2 machineguns, destructive devices, ammunition, and money.

3 Overt Act No. 17: On December 14, 2023, in a telephone
4 conversation, Co-conspirator 1, using coded language, discussed with
5 CS-1 and CS-2 his conversations with defendant IDROBO about the
6 firearms shown to Co-conspirator 3 in the Czech Republic and the
7 exchange of cocaine for firearms and money.

8 Overt Act No. 18: On December 18, 2023, in Signal messages,
9 Co-conspirator 1, using coded language, discussed with CS-2 the
10 transportation and delivery of 20 kilograms of cocaine and the
11 transportation and delivery of firearms that would be used to
12 purchase a portion of the 20 kilograms of cocaine.

13 Overt Act No. 19: On December 19, 2023, in Betulia, Suarez,
14 Valle del Cauca, Colombia, Co-conspirator 4 transported CS-1 to a
15 concealed cocaine laboratory that was producing and packaging 21
16 kilograms of cocaine for the importation into the United States.

17 Overt Act No. 20: On December 19, 2023, in Betulia, Suarez,
18 Valle del Cauca, Colombia, Co-conspirator 1, 2 and 4, on behalf of
19 defendants IDROBO and PALTA, met with CS-1 at a cocaine laboratory
20 that was producing and packaging 21 kilograms of cocaine that were
21 stamped with "Hollywood," as depicted in the below photographs, and
22 intended to be imported into the United States, and discussed the
23 process of manufacturing, packaging, and transporting cocaine.

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Overt Act No. 21: On December 21, 2023, in Signal messages, Co-conspirator 1 ordered from CS-2 50 AK-47 rifles, 10,000 AK-47 rounds of ammunition, six rocket-propelled grenade launchers, 100 rocket-propelled grenades, 10,000 rounds of .762 ammunition, 10,000 rounds of 2.23 ammunition, 100 grenades, 12 machineguns, and 300 banana clips for AK-47 rifles.

Overt Act No. 22: On December 21, 2023, in Jamundi, Valle del Cauca, Colombia, Co-conspirator 2 traveled with CS-1 to a parking lot in Cali, Colombia, to meet with a person he believed to be a drug customer but who was, in fact, an undercover agent with the Colombian National Police ("UC-3") to deliver 21 kilograms of cocaine that were intended to be imported into the United States.

Overt Act No. 23: On December 21, 2023, in Cali, Colombia, Co-conspirator 2 distributed approximately 21 kilograms of a mixture and substance containing a detectable amount of cocaine that were

1 packaged in materials depicting the "Hollywood" sign to CS-1 and
2 UC-3, as depicted in the below photographs.



19 Overt Act No. 24: On January 18, 2024, in Cali, Colombia, Co-
20 conspirator 1 met with CS-1, CS-2, and UC-3 and accepted \$8,000 USD
21 in payment for his investment in one kilogram of the 21 kilograms of
22 cocaine provided to CS-1 and UC-3 on December 21, 2023. In the same
23 meeting, using coded language, Co-conspirator 1 discussed the
24 transport, importation, and distribution of cocaine in the United
25 States.

26 Overt Act No. 25: On January 18, 2024, in Cali, Colombia, Co-
27 conspirator 1, on behalf of defendant IDROBO, using coded language,
28 negotiated with CS-1 and CS-2 to purchase and transport additional

1 firearms, machineguns, destructive devices, and ammunition in
2 exchange for cocaine.

3 Overt Act No. 26: On March 2, 2024, in Toribio, Cauca,
4 Colombia, using coded language, defendant PALTA and Co-conspirator 1
5 met with CS-1, toured a cocaine laboratory, and discussed the
6 transportation and exchange of firearms for cocaine.

7 Overt Act No. 27: On March 2, 2024, in Tacueyo, Toribio,
8 Cauca, Colombia, Co-conspirator 1 transported CS-1 to an airstrip
9 that would be used to receive and exchange firearms for cocaine.

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1 COUNT THREE

2 [21 U.S.C. § 963]

3 [ALL DEFENDANTS]

4 A. OBJECT OF THE CONSPIRACY

5 Beginning on an unknown date, but no later than on or about
6 March 25, 2023, and continuing until on or about March 27, 2024, in
7 the countries of Colombia, Netherlands, the Czech Republic, and
8 elsewhere, defendants IVAN JACOBO IDROBO ARREDONDO, also known as
9 ("aka") "Ivan Jacob Idrobo Arredondo," aka "Marlon Vasquez," and JUAN
10 DIEGO PALTA MONTERO, aka "Juan Diego Palta Moreno," aka "Ñeque," each
11 of whom will be arrested and first brought to the Central District of
12 California, and others known and unknown to the Grand Jury, conspired
13 and agreed with each other to knowingly and intentionally manufacture
14 and distribute at least five kilograms of a mixture and substance
15 containing a detectable amount of cocaine, a Schedule II narcotic
16 drug controlled substance, intending, knowing, and having reasonable
17 cause to believe that such substance would be unlawfully imported
18 into the United States, in violation of Title 21, United States Code,
19 Sections 959(a), 960(a)(3), and (b)(1)(B)(ii).

20 B. MANNER AND MEANS OF THE CONSPIRACY

21 The object of the conspiracy was to be accomplished, in
22 substance, as follows:

23 Paragraphs 1 through 7, alleged in Count Two, Section B of this
24 First Superseding Indictment, are re-alleged and incorporated by
25 reference herein.

26 C. OVERT ACTS

27 On or about the following dates, in furtherance of the
28 conspiracy and to accomplish its object, defendants IDROBO and PALTA,

1 together with others known and unknown to the Grand Jury, committed
2 and caused to be committed various overt acts in the countries of
3 Colombia, the Czech Republic, and the Netherlands, and elsewhere,
4 including, but not limited to, the following:

5 The Overt Acts 1 through 27, alleged in Count Two, Section C of
6 this First Superseding Indictment, are re-alleged and incorporated by
7 reference herein.

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1 COUNT FOUR

2 [18 U.S.C. § 924(o)]

3 [ALL DEFENDANTS]

4 A. OBJECT OF THE CONSPIRACY

5 Beginning on an unknown date, but no later than on or about
6 March 25, 2023, and continuing until on or about March 27, 2024, in
7 the countries of Colombia and the Czech Republic, and elsewhere,
8 defendants IVAN JACOBO IDROBO ARREDONDO, also known as ("aka") "Ivan
9 Jacob Idrobo Arredondo," aka "Marlon Vasquez," and JUAN DIEGO PALTA
10 MONTERO, aka "Juan Diego Palta Moreno," aka "Ñeque," each of whom
11 will be arrested and first brought to the Central District of
12 California, and others known and unknown to the Grand Jury, conspired
13 and agreed with each other to knowingly possess firearms,
14 machineguns, as defined in Title 18, United States Code, Section
15 921(a)(23) and Title 26, United States Code, Section 5485(b), and
16 destructive devices, as defined in Title 18, United States Code,
17 Section 921(a)(4), in furtherance of a drug trafficking crime,
18 namely, conspiracy to manufacture and distribute cocaine for the
19 purpose of unlawful importation, in violation of Title 21, United
20 States Code, Section 963, as charged in Count Three of this First
21 Superseding Indictment, all in violation of Title 18, United States
22 Code, Sections 924(c)(1)(A)(i), (c)(1)(B)(ii).

23 B. MANNER AND MEANS OF THE CONSPIRACY

24 The object of the conspiracy was to be accomplished, in
25 substance, as follows:

26 1. Defendants IDROBO and PALTA, and Co-conspirators 1 and 3,
27 would negotiate the pricing and purchase of firearms, machineguns,

1 and destructive devices in exchange for kilogram quantities of
2 cocaine.

3 2. Defendant IDROBO and Co-conspirator 1 would send delegates
4 on their behalf to view firearms, machineguns, and destructive
5 devices that would be exchanged for kilogram quantities of cocaine.

6 3. Co-conspirator 3 would travel on behalf of defendant IDROBO
7 and Co-conspirator 1 to view and handle firearms, machineguns, and
8 destructive devices that would be exchanged for kilogram quantities
9 of cocaine.

10 4. Defendants IDROBO and PALTA, and Co-conspirator 1, would
11 order firearms, machineguns, and destructive devices on behalf of a
12 drug trafficking organization in exchange for kilogram quantities of
13 cocaine.

14 5. Defendant PALTA and Co-conspirator 1 would tour airstrips
15 in Colombia to coordinate the delivery of kilogram quantities of
16 cocaine and the receipt of firearms, machineguns, and destructive
17 devices.

18 C. OVERT ACTS

19 On or about the following dates, in furtherance of the
20 conspiracy and to accomplish its object, defendants IDROBO and PALTA,
21 and Co-conspirators 1 and 3, together with others known and unknown
22 to the Grand Jury, committed and caused to be committed various overt
23 acts in the countries of Colombia and the Czech Republic, and
24 elsewhere, including, but not limited to, the following:

25 The Overt Acts 9 through 27, alleged in Count Two, Section C of
26 this First Superseding Indictment, are re-alleged and incorporated by
27 reference herein.

1 COUNT FIVE

2 [21 U.S.C. §§ 959(a), 960(a)(3), (b)(1)(B)(ii); 18 U.S.C. § 2(b)]

3 [ALL DEFENDANTS]

4 On or about December 21, 2023, in the country of Colombia,
5 defendants IVAN JACOBO IDROBO ARREDONDO, also known as ("aka") "Ivan
6 Jacob Idrobo Arredondo," aka "Marlon Vasquez," and JUAN DIEGO PALTA
7 MONTERO, aka "Juan Diego Palta Moreno," aka "Ñeque," each of whom
8 will be arrested and first brought to the Central District of
9 California, knowingly distributed, and willfully caused to be
10 distributed, at least five kilograms of a mixture and substance
11 containing a detectable amount of cocaine, that is, approximately 21
12 kilograms, a Schedule II narcotic drug controlled substance,
13 intending, knowing, and having reasonable cause to believe that such
14 substance would be unlawfully imported into the United States.

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1 COUNT SIX

2 [18 U.S.C. §§ 924(c)(1)(A)(i), (c)(1)(B)(ii), 2(b)]

3 [DEFENDANT IDROBO]

4 On or about December 6, 2023, in the country of the Czech
5 Republic, defendant IVAN JACOBO IDROBO ARREDONDO, also known as
6 ("aka") "Ivan Jacob Idrobo Arredondo," aka "Marlon Vasquez," who will
7 be arrested and first brought to the Central District of California,
8 knowingly possessed, and willfully caused to be possessed, firearms
9 and machineguns, as defined in Title 18, United States Code, Section
10 921(a)(23), and Title 26, United States Code, Section 5845(b),
11 namely, Samopal, Model 58, 7.62 caliber submachineguns, and UK-59,
12 model 1959, 7.62x54mm caliber belt-fed machineguns, each of which
13 defendant IDROBO knew to be a machinegun, and destructive devices, as
14 defined in Title 18, United States Code, Section 921(a)(4), namely,
15 Ruchnoi Protivotankovy Granatomet rocket-propelled grenade
16 launchers, in furtherance of a drug trafficking crime, namely,
17 conspiracy to manufacture and distribute cocaine for the purpose of
18 unlawful importation, in violation of Title 21, United States Code,
19 Section 963, as charged in Count Three of this First Superseding
20 Indictment.

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1 FORFEITURE ALLEGATION ONE

2 [21 U.S.C. §§ 853, 970; 18 U.S.C. § 924(d)(1)]

3 1. Pursuant to Rule 32.2(a) of the Federal Rules of Criminal
4 Procedure, notice is hereby given that the United States of America
5 will seek forfeiture as part of any sentence, pursuant to Title 21,
6 United States Code, Sections 853 and 970; and Title 18, United States
7 Code, Section 924(d)(1), in the event of any defendant's conviction
8 of the offenses set forth in any of Counts Three or Five of this
9 First Superseding Indictment.

10 2. Any defendant so convicted shall forfeit to the United
11 States of America the following:

12 (a) All right, title and interest in any and all property,
13 real or personal, constituting or derived from, any proceeds which
14 the defendant obtained, directly or indirectly, from any such
15 offense;

16 (b) All right, title and interest in any and all property,
17 real or personal, used, or intended to be used, in any manner or
18 part, to commit, or to facilitate the commission of any such offense;

19 (c) All right, title, and interest in any firearm or
20 ammunition involved in or used in any such offense; and

21 (d) To the extent such property is not available for
22 forfeiture, a sum of money equal to the total value of the property
23 described in subparagraphs (a), (b), and (c).

24 3. Pursuant to Title 21, United States Code, Section 853(p),
25 any defendant so convicted shall forfeit substitute property if, by
26 any act or omission of said defendant, the property described in the
27 preceding paragraph, or any portion thereof: (a) cannot be located
28 upon the exercise of due diligence; (b) has been transferred, sold

1 to, or deposited with a third party; (c) has been placed beyond the
2 jurisdiction of the court; (d) has been substantially diminished in
3 value; or (e) has been commingled with other property that cannot be
4 divided without difficulty.

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1 FORFEITURE ALLEGATION TWO

2 [18 U.S.C. § 924(d)(1) and 28 U.S.C. § 2461(c)]

3 1. Pursuant to Rule 32.2 of the Federal Rules of Criminal
4 Procedure, notice is hereby given that the United States of America
5 will seek forfeiture as part of any sentence, pursuant to Title 18,
6 United States Code, Section 924(d)(1), and Title 28, United States
7 Code, Section 2461(c), in the event of any defendant's conviction of
8 the offenses set forth in any of Counts Four or Six of this First
9 Superseding Indictment.

10 2. Any defendant so convicted shall forfeit to the United
11 States of America the following:

12 (a) All right, title, and interest in any firearm or
13 ammunition involved in or used in any such offense; and

14 (b) To the extent such property is not available for
15 forfeiture, a sum of money equal to the total value of the property
16 described in subparagraph (a).

17 3. Pursuant to Title 21, United States Code, Section 853(p),
18 as incorporated by Title 28, United States Code, Section 2461(c), the
19 convicted defendant shall forfeit substitute property, up to the
20 value of the property described in the preceding paragraph if, as the
21 result of any act or omission of said defendant, the property
22 described in the preceding paragraph or any portion thereof (a)
23 cannot be located upon the exercise of due diligence; (b) has been
24 transferred, sold to, or deposited with a third party; (c) has been
25 placed beyond the jurisdiction of the court; (d) has been

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1 substantially diminished in value; or (e) has been commingled with
2 other property that cannot be divided without difficulty.

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4 A TRUE BILL
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6 
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